

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JAYSUKH RUDANI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

IDEANOMICS, INC. f/k/a SEVEN STARS
CLOUD GROUP, INC. f/k/a WECAST
NETWORK, INC., BING YANG,
ROBERT BENYA, ZHENG WU *a/k/a*
BRUNO WU,

Defendants.

No. 1:19-cv-06741-GBD

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Jaysukh Rudani ("Lead Plaintiff"), on behalf of himself and the putative Class,¹ respectfully moves this Court for an Order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure (a) preliminarily approving the proposed Settlement of the above-captioned securities class action lawsuit (the "Action"); (b) approving the form and manner of providing notice of the Settlement to the Class; (c) certifying the Class for settlement purposes; (d) appointing Lead Plaintiff as Class Representative and Faruqi & Faruqi, LLP as Class Counsel for settlement purposes; and (e) setting a hearing date for final

¹ Unless otherwise noted, all capitalized terms have the meaning ascribed to them in the Stipulation of Settlement dated July 30, 2021 ("Stipulation"), filed concurrently herewith.

approval of the Settlement, the proposed Plan of Allocation, and Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.

This motion is based upon the accompanying Stipulation, the Memorandum of Law in Support of Lead Plaintiff's Motion for Preliminary Approval of Class Action Settlement, the Declaration of Katherine M. Lenahan in support hereof, and all related exhibits.

Dated: July 30, 2021

Respectfully submitted,

FARUQI & FARUQI, LLP

By: /s/ Katherine M. Lenahan
Katherine M. Lenahan

Katherine M. Lenahan
685 Third Avenue, 26th Floor
New York, NY 10017
Ph: (212) 983-9330
Fx: (212) 983-9331
E-mail: klenahan@faruqilaw.com

Attorneys for Lead Plaintiff Jaysukh Rudani